



December 5, 2012

**TROY CORPORATION**

Via email

Document Processing Desk (DCI/AD)  
Attention: Re-evaluation Team Leader, PM36  
U.S. EPA (7510P)  
One Potomac Yard (South Building)  
2777 S. Crystal Drive  
Arlington, VA 22202

RE: Generic DCI 90 Day Response  
Case # 0044-10,10'Oxybisphenoxyarsine  
Chemical # 012601

Attention: Rebecca Von Dem Hagen

Dear Ms. Von Dem Hagen:

Enclosed please find an amended Troy Chemical Corporation Generic DCI 90 Day response for the chemical 10, 10'Oxybisphenoxyarsine. As part of this response we enclose the following documents:

- Requirements Status and Registrant's Response Form
- Attachment to the Requirements Status and Registrant's Response Form

This revised document is being submitted to address the fact that Troy Chemical Corporation is an active member of the Antimicrobial Exposure Assessment Task Force II and will be sharing in the cost to comply with the exposure assessment requirements found the DCI notice.

Ms. Von Dem Hagen please contact me should you have any additional questions concerning our response. I can be reached by phone or email (973-443-4200, X2249 or [krygsmaa@troycorp.com](mailto:krygsmaa@troycorp.com)).

Sincerely,

Adrian Krygsman  
Director, Product Registration

United States Environmental Protection Agency  
Washington, D.C. 20460  
DATA CALL-IN RESPONSE

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.  
Use additional sheet(s) if necessary.

1. Company Name and Address TROY CHEMICAL CORP 8 VREELAND ROAD, P.O. Box 955 FLORHAM PARK, NJ 079324200		2. Case # and Name 0044 - 10,10'-Oxybisphenoxarsine Chemical # and Name: 012601 10,10'-Oxybisphenoxarsine		3. Date and Type of DCI and Number 24-Jan-2012 GENERIC ID: # GDCI-012601-1094	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
5383-124		5383-124	✓ yes	N/A	N/A
5383-125		5383-124		N/A	N/A
5383-126		5383-124		N/A	N/A
5383-129		5383-124		N/A	N/A
5383-130		5383-124		N/A	N/A
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.				9. Date 4/27/2012	
Signature and Title of Company's Authorized Representative <u>Adrian Krzyzowski</u> Director, Product REG.					
10. Name of Company <u>TROY CORPORATION for TROY CHEMICAL CORP.</u>				11. Phone Number <u>973-443-4200</u>	



United States Environmental Protection Agency  
Washington, D.C. 20460

OMB Approval 2070-0174

**REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE**

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1. Company Name and Address  TROY CHEMICAL CORP 8 VREELAND ROAD, P.O. Box 955 FLORHAM PARK, NJ 079324200		2. Case # and Name  0044 - 10,10'-Oxybisphenoxarsine Chemical # and Name: 012601 10,10'-Oxybisphenoxarsine			3. Date and Type of DCI and Number  24-Jan-2012 GENERIC ID # GDCI-012601-1094				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	<b>Applicator Exposure Data Requirements (Conventional Chemical)</b>								
875.1200	Dermal exposure--Indoor	N				X	TEP	24	2
875.1400	Inhalation exposure--indoor	N				X	TEP	24	2
875.1600	Application exposure monitoring data reporting (3)	N				X	TEP	24	2
875.1700	Product Use Information	N				X	TEP	8	1
	<b>Environmental Fate Data Requirements (Conventional Chemical)</b>								
835.2120	Hydrolysis of parent and degradates as a function of pH at 25 C	N				X	PAIRA; TGAI	12	1
835.2240	Direct photolysis rate of parent and degradates in water	N				X	PAIRA; TGAI	12	1
	<b>Nontarget Plant Protection Data Requirements (Conventional Chemical)</b>								
850.5400	Algal toxicity, Tiers 1 and II	N				X	TEP; TGAI	12	1
10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.  Signature and Title of Company's Authorized Representative <u>Adrian Kuyumjian / Director</u>							11. Date  8/02/2013		
12. Name of Company <u>TROY CHEMICAL CORPORATION</u>							13. Phone Number <u>978-443-4200, X2249</u>		

United States Environmental Protection Agency  
Washington, D.C. 20460  
**REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE**

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			1	2	3				
	<b>Toxicology Data Requirements (Conventional Chemical)</b>								
870.1300	Acute inhalation toxicity	N				X	EP; MP; TGA	8	/
870.3100	90-Day oral toxicity in rodents	N				X	TGA	24	/
870.3200	21/28-day dermal toxicity	N				X	TGA/TGA & EP	24	/
870.3700	Prenatal developmental toxicity study	N				X	TGA	24	/
870.3800	Reproduction and fertility effects	N				X	TGA	48	/
870.5100	Bacterial reverse mutation test	N				X	TGA	8	/
870.5300	In vitro mammalian cell gene mutation test	N				X	TGA	8	/
870.5385	Mammalian bone marrow chromosomal aberration test	N				X	TGA	8	/
870.5395	Mammalian erythrocyte micronucleus test	N				X	TGA	8	/
870.7485	Metabolism and pharmacokinetics (1)	Y				X	PAI; PAIRA	24	/



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			1	2	3				
835.1110	Activated sludge sorption isotherm	N				X	TGAI	12	/
835.3110	Ready biodegradability	N				X	TGAI	12	/
850.6800	Modified Activated Sludge Respiration Inhibition	N				X	TGAI	12	/
SS-1125	Leaching from Pool Liners, Vinyl Flooring, and Mattress Covers (2)	Y				X	EP; TGAI	24	/

Attachment to Requirements Status and Registrant's Response Form  
Case # 0044- 10,10' Oxybisphenoxarsine  
Chemical # and Name: 012601

<b>Guideline Requirement Number</b>	<b>Study Title</b>	<b>Registrants Response</b>
875.1200	Dermal Exposure-Indoor	Troy Chemical is an active member of the American Chemistry Council (ACC) Antimicrobial Exposure Assessment Task Force II and will address this requirement through the development of data through this program.
875.1400	Inhalation Exposure-Indoor	Troy Chemical is an active member of the American Chemistry Council (ACC) Antimicrobial Exposure Assessment Task Force II and will address this requirement through the development of data through this program.
875.1600	Application Exposure Monitoring Data Reporting	Troy Chemical is an active member of the American Chemistry Council (ACC) Antimicrobial Exposure Assessment Task Force II and will address this requirement through the development of data through this program.